

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

PAULSSON GEOPHYSICAL
SERVICES, INC.,

Plaintiff/Counterdefendant,

V.

AXEL M. SIGMAR; RESERVOIR
SYSTEMS, INC.; SIGMA RESEARCH, INC.
and RESERVOIR SYSTEMS
INTERNACIONAL, S.A. DE C.V.,

Defendants/Counterclaimants,

V.

SHELL TECHNOLOGY VENTURES, INC.,

Third-Party Defendant.

C.A. No. A-06-CA-952SS

**PAULSSON GEOPHYSICAL SERVICES, INC.'S
PRELIMINARY WITNESS AND EXHIBIT LISTS**

Pursuant to this Court’s Scheduling Order [Dkt. No. 157], and subsequent Order extending deadlines [Dkt. No. 175], plaintiff/counterdefendant Paulsson Geophysical Services, Inc. (*P/GSI*) files the following list of potential witnesses and proposed exhibits.

WITNESSES

Witness	Description
Robert G. Quinn	Attorney for P/GSI. He has knowledge regarding P/GSI's dealings with defendants, P/GSI's services and customers, and the seismic market in which P/GSI did business.
Bjorn Paulsson	Dr. Paulsson is the President of Paulsson Geophysical Services Inc., the plaintiff in this case. He has knowledge regarding P/GSI's dealings with defendants, P/GSI's services and customers, and the seismic market in which P/GSI does business.

Witness	Description
Axel M. Sigmar	Mr. Sigmar is a defendant in this case and the controlling executive and/or shareholder for Reservoir Systems Internacional, S.A. de C.V. (RSM), Reservoir Systems, Inc. (RSI), and Sigma Research, Inc. (SRI). He has knowledge regarding the business activities of himself and RSM, RSI, and SRI.

TESTIFYING EXPERTS

P/GSI has not retained any testifying expert, and it does not currently anticipate that any of the witnesses listed above will testify to matters that fall under FED. R. EVID. 702, 703, or 705.

EXHIBITS

No.	Description
P-1.	March 7, 2000 NDA between Sigmar and P/GSI (PAU 000010 – 13)
P-2.	March 21, 2004 NDA between SRI and P/GSI (PAU 000014 – 17)
P-3.	P/GSI Generic Proposal (SIG0002072 – 88)
P-4.	P/GSI Petrobras Proposal (SIG0002066 – 71)
P-5.	Trademark Registration for “Massive 3D VSP” (PAU 000005 – 06)
P-6.	Trademark Registration for “P/GSI” (PAU 000007 – 09)
P-7.	’819 P/GSI Patent (SIG0000261 – 73)
P-8.	’133 P/GSI Patent (SIG0000300 – 15)
P-9.	’501 P/GSI Patent (SIG0000274 – 99)
P-10.	March 3, 2005 Letter of Authority from P/GSI to RSI (SIG0000227)
P-11.	May 24, 2005 Letter from RSI to whom it may concern (PAU 000023 – 24)
P-12.	July 11, 2005 RSM’s “Business Information” sent to Alliance Capital (PAU 001987 – 2007)
P-13.	July 16, 2005 Loan Proposal Terms & Conditions from Alliance Capital to RSI and RSM, signed by Axel Sigmar as president of RSI and RSM (PAU 000019 – 20)
P-14.	May 26, 2006 E-mail from Bjorn Paulsson to Axel Sigmar (SIG0002204 – 08)

No.	Description
P-15.	June 8, 2006 Letter from Axel Sigmar to Pemex Legal Department (PAU 000050 – 51)
P-16.	July 24, 2006 Pemex Contract (PAU 001459 – 1646)
P-17.	October 13, 2006 Pemex Letter (SIG0002284 – 2285)
P-18.	Printout of Pemex website at http://pemex.gob.mx/files/content/pep_cont_op_sep06.pdf
P-19.	May 30, 2005 letter from the Department of Energy of Mexico to Pemex (PAU 000031)
P-20.	Order Granting Plaintiff's Motion for Temporary Restraining Order signed December 6, 2006 (Dkt. No. 12)
P-21.	January 11, 2007 Letter from Aimée M. Robert to Christopher Peele
P-22.	Affidavit of Axel M. Sigmar signed January 16, 2007
P-23.	June 11, 2005 E-mail from Robert Quinn to Axel Sigmar (SIG0002130 – 2132)
P-24.	May 9, 2006 E-mail from Axel Sigmar to Bjorn Paulsson (SIG0002166 – 2167)
P-25.	May 14, 2006 E-mail from Axel Sigmar to Bjorn Paulsson (SIG0002168 – 2170)
P-26.	May 15, 2006 E-mail from Matthew Hudson to Bjorn Paulsson (SIG0002171 – 2172)
P-27.	May 24, 2006 E-mail from Bjorn Paulsson to Axel Sigmar (SIG0002193 – 2194)
P-28.	October 27, 2006 E-mail from Bjorn Paulsson to Mauricio Mireles (PAU 000702 – 707)
P-29.	May 24, 2005 Letter from SRI to whom it may concern, with certified translation (PAU 000029 – 30)
P-30.	May 30, 2005 Letter from Oscar Margain Pitman to Arturo Pérez Aldana, with certified translation (PAU 000031)
P-31.	June 8, 2006 Letter from Axel Sigmar to Joaquín Aguirre, with certified translation (PAU 000050 – 51)
P-32.	Bond Policy filed on December 6, 2006, in <i>Tao Technology, S.A. de C.V. v. Reservoir Systems Internacional, S.A. de C.V.</i> , with certified translation (SIG002260 – 64)
P-33.	October 13, 2006 Letter from José Alberto Santana Fernández to Axel Sigmar, with certified translation (SIG0002284 – 85)
P-34.	October 13, 2006 Informational Summary, with certified translation (SIG0002286 – 87)

No.	Description
P-35.	October 14, 2006 Pemex Memo, with certified translation (SIG002288 – 91)
P-36.	January 9, 2007 Letter from Axel Sigmar to Arturo Pérez Aldana, with certified translation (SIG0002299)
P-37.	December 20, 2006 Letter from Axel Sigmar to Arturo Pérez Aldana, with certified translation (SIG0002300)
P-38.	March 9, 2006 Letter from Bennett & Monroy to RSM, with certified translation (SR002265 – 67)
P-39.	October 30, 2006 Letter from José Alberto Santana Fernández to Axel Sigmar, with certified translation (SIG0002318)
P-40.	October 31, 2006 Letter from Bjorn Paulsson to Arturo Pérez Aldana including attachments, with certified translation (SIG0002292 – 98)
P-41.	June 6, 2006 E-mail from Axel Sigmar to Bjorn Paulsson (PAU 000354-56)
P-42.	June 30, 2005 Services Agreement between RSI and RSM (SIG0002383-2403)
P-43.	September 2006 exchange of e-mails between RSM and TGS-NOPEC Geophysical Company, L.P. (RSM000029-30)
P-44.	January 28, 2005 E-mail from Axel Sigmar to P/GSI (PAU 000076 – 77)
P-45.	Summary of RSM's transfers to RSI (RSM000009)
P-46.	June 30, 2005 Sublicense and Sales Agreement between RSI and RSM (RSM000078 – 92)
P-47.	July 16, 2005 Alliance Capital Partners, Inc. Confidentiality and Fee Agreement (PAU 000052 – 56)
P-48.	Certified copy of Plaintiff's Original Petition, filed on January 30, 2007, in <i>TGS-NOPEC Geophysical Company, L.P. v. Reservoir Systems, Inc.</i> , No. 2007-04888, 280th Judicial District Court of Harris County, Texas
P-49.	Certified copy of Plaintiff's Original Petition, filed on January 5, 2007, in <i>Fairfield Industries Incorporated v. Reservoir Systems, Inc.</i> , No. 2007-00680, 234th Judicial District Court of Harris County, Texas

Additionally, P/GSI reserves the right to use any proposed exhibits of the other parties. Discovery and production are ongoing in this case; thus, P/GSI reserves the right to supplement these lists prior to the time for pretrial filings as set forth under Local Rule CV-16(e).

Respectfully submitted,

/s/ David P. Blanke

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CERTIFICATE OF SERVICE

I certify that on March 26, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which electronically mailed notification of such filing to the following:

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